



Mark David McPherson
+1 212 813 8869
mmcpherson@goodwinlaw.com

Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018

goodwinlaw.com
+1 212 813 8800

July 22, 2025

VIA ECF

Hon. Jennifer L. Rochon
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 20B
New York, New York 10007

**Re: In re RetailMeNot Browser Extension Litigation, No. 1:25-cv-00783 (JLR)
Joint Motion for Extension of Word Limits for Motion to Dismiss Briefing**

Dear Judge Rochon:

Pursuant to the Court's Individual Rules of Practice in Civil Cases, Defendants RetailMeNot, Inc. and Ziff Davis Inc., together with Plaintiffs Just Josh, Inc., Motion Butter, LLC, Richard Young, TechSource Official, ToastyBros, LLC, and Brevard Marketing, LLC, respectfully submit this letter to jointly request an extension of the word limits for the parties' briefing on Defendants' motion to dismiss the Consolidated Class Action Complaint (ECF No. 34).

Plaintiffs' Consolidated Class Action Complaint alleges nine claims against Defendants. (ECF No. 34.) Defendants' motion to dismiss the CAC is due on July 25, 2025. (ECF No. 33.) After discussion, the parties agree to extend the word limits for their motion dismiss briefing. The parties believe that an extension is necessary given the number of consolidated actions; the length of the CAC; the number of claims against Defendants; and the issues Defendants intend to raise by their motion to dismiss (under both FRCP 12(b)(1) and FRCP 12(b)(6)).

While the parties will endeavor to submit briefs as short as possible, the parties respectfully request that the Court enter the following word limits for the memoranda of law in support of and in opposition to Defendants' motion to dismiss:

- Opening Brief: 10,000 words;
- Opposition Brief: 10,000 words;
- Reply Brief: 4,000 words.

This is the parties' first request for an extension of the word limits, and all parties agree and stipulate to the relief requested herein.

The Court GRANTS the request, and will permit the parties to file memoranda of law in support of and opposition to the motion limited to 10,000 words, and a reply memoranda limited to 4,000 words.

Date: July 23, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Jennifer Rochon".
JENNIFER L. ROCHON
United States District Judge



Hon. Jennifer L. Rochon
July 22, 2025
Page 2

Respectfully submitted,

/s/ Mark David McPherson

Mark David McPherson
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
T: (212) 813-8800
E: mmcpherson@goodwinlaw.com

Counsel for Defendants

/s/ Julian Hammond

Julian Hammond (*pro hac vice*)
HAMMONDLAW, P.C.
1201 Pacific Ave., 6th Floor
Tacoma, WA 98402
T: (310) 601-6766
E: jhammond@hammondlawpc.com

/s/ Thomas E. Loeser

Thomas E. Loeser (*pro hac vice*)
COTCHETT PITRE & MCCARTHY LLP
1809 7th Avenue, Suite 1610
Seattle, WA 98101
T: (206) 970-8181
E: tloeser@cpmlegal.com.com

/s/ Ashley M. Crooks

Ashley M. Crooks (N.Y. Bar No.
5800776)
HAUSFELD LLP
33 Whitehall Street, 14th Floor
New York, NY 10004
T: (646) 357-1100
E: acrooks@hausfeld.com

Interim Co-Lead Counsel for Plaintiffs